COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

	j
AN INVESTIGATION INTO THE INTRASTATE)
SWITCHED ACCESS RATES OF ALL KENTUCKY)
INCUMBENT AND COMPETITIVE LOCAL) ADMINISTRATIVE
EXCHANGE CARRIERS) CASE NO. 2010-00398

FRANKFORT PLANT BOARD'S RESPONSES TO AT&T'S FIRST DATA REQUESTS

Pursuant to the Commission's March 10, 2011 Order in this matter, Frankfort Plant Board ("FPB") provides the following responses to AT&T's May 2, 2011 data requests.

GENERAL OBJECTIONS

- FPB objects to these requests to the extent they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
- 2. FPB objects to each request involving documents or information that is subject to the attorney-client privilege or are attorney work-product.
- 3. FPB objects to these requests to the extent they seek to impose obligations on FPB that exceed the requirements of the Kentucky Rules of Civil Procedure or other applicable Kentucky law.

- 4. FPB objects to these requests to the extent they are vague, ambiguous, overly-broad, imprecise, call for speculation or to the extent they utilize undefined terms or insufficiently defined terms or phrases.
- 5. FPB objects to these requests to the extent they require the production of information in the public domain or which is already in the requesting party's custody or control.
- 6. FPB objects to each and every request that seeks to have FPB create documents or information not in existence at the time of the request.

Without waiving any of these general objections, FPB responds as follows:

ITEM 1:

Do you offer standalone basic local exchange service as defined in KRS 278.541? If so, for each year from 2001 through 2010, and for 2011 most recent data available, please provide the total number of revenue-producing *retail* access lines for the following:

- (a) Residential standalone basic local exchange service (as defined in KRS 278.541) access lines, including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP).
- (b) Business standalone basic local exchange service (as defined in KRS 278.541) access lines, including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP).
- (c) Residential non-basic local exchange service access lines (as defined in KRS 278.541), including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP), and voice grade equivalent lines for ISDN-BRI.

- (d) Business non-basic local exchange service access lines (as defined in KRS 278.541), including "lines" being provided via a non-traditional means such as voice over Internet protocol (VoIP), and voice grade equivalent lines to which intrastate switched access applies (e.g., all activated B-channels in an ISDN-PRI or ISDN-BRI to the extent the ISDN-PRI or ISDN-BRI is providing connectivity to the PSTN).
- (e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

Response:

1(a) - (d): FPB entered the telephone business in 2003.

	1(a)	1(k))	1(c)	1(d)
Year/Customer Class	Residential	Small Biz	Large Biz	Residential	Small Biz	Large Biz
2003	176	16	7	475	12	0
2004	966	155	24	2891	138	2
2005	2051	376	32	5904	290	2
2006	2392	599	48	8003	478	4
2007	2574	712	49	8660	591	4
2008	2667	802	65	8891	649	3
2009	2612	869	65	8464	663	3
2010	2521	957	27	7714	693	1
2011	2370	905	26	6395	619	1

1(e):

Not Applicable.

ITEM 2:

For each year from 2001 through 2010, and for 2011 most recent data available, please provide the average monthly revenue per line identified in Data Request 1(a), 1(b), 1(c), 1(d) and 1(e). If the average monthly revenue figures are not available in the format requested for each of these types of lines, provide the total annual revenue for the years requested, for all lines identified in Data Request 1, presented at the greatest level of disaggregation the ILEC maintains in its historical revenue records.

Response:

FPB does not maintain revenue data prior to 2007.

Total Billed Revenue

Year/Customer Class	Residential	Small Biz	Large Biz
2007(from April)	\$1,053,854.31	\$197,778.59	\$13,515.30
2008	\$1,453,351.30	\$298,566.21	\$24,355.13
2009	\$1,428,619.71	\$329,792.81	\$20,689.15
2010	\$1,352,657.00	\$355,177.27	\$9,865.80
2011(thru April)	\$429,400.37	\$122,912.40	\$3,288.60

ITEM 3:

For each year from 2001 through 2010, and for 2011 most recent data available, please provide the total number of all revenue-producing *wholesale* access lines (*i.e.*, resale, UNE loops, and facilities that have the capability to provide voice grade equivalent service) for the following:

- (a) Residential standalone basic local exchange service (as defined in KRS 278.541).
- (b) Business standalone basic local exchange service (as defined in KRS 278.541).
- (c) Residential non-basic local exchange service access lines, including voice grade equivalent lines for ISDN BRI.
- (d) Business non-basic local exchange service access lines, including voice grade equivalent lines (e.g., all activated B-channels in an ISDN-PRI or ISDN-BRI to the extent the ISDN-PRI or ISDN-BRI is providing connectivity to the PSTN).
- (e) Other facilities to which intrastate switched access applies, if any, not included in (a) through (d) above.

Response:

FPB does not provide wholesale services.

ITEM 4:

For each of the *retail* types of lines identified in Data Request 1(a) through (e), for 2010, and for 2011 most recent data available, provide the calculated weighted average local rate per line per month, and all back-up information and worksheets that support these calculations.

Response:

FPB has not changed its rates since it entered the telephone business in September 2003. FPB charges \$13.25 per line per month for residential service and \$21.45 per line per month for business service.

	Retail Type	Cost Per Line	# Lines	
2010	Residential	13.25	10235	135613.8
	Small Biz	21.45	1650	35392.5
	Large Biz	30.45	28	852.6
				14.42616
2011	Residential	13.25	8765	116136.3
	Small Biz	21.45	1524	32689.8
	Large Biz	30.45	27	822.15
				14.50642

<----Average Weighted Cost Per Line Per Month

<----Average Weighted Cost Per Line Per Month

Average Weighted Cost Per Line Per Month

((# Residential Lines * rate) + (# Small Biz Lines * Rate) + (# Large Biz Lines * Rate)) / (Total Lines)

ITEM 5:

For each of the *wholesale* types of lines in Data Request 3 (a) through (e), for 2010, and for 2011 most recent data available, provide the calculated weighted average local rate per line per month, and all back-up information and worksheets that support these calculations.

Response:

FPB does not provide wholesale services.

ITEM 6:

For 2010, and 2011 most current data available, provide the following:

- (a) Volumes of intraMTA minutes terminated by you on behalf of all wireless carriers, and dollars billed for such terminating intraMTA minutes broken out by
 - 1. IntraLATA intrastate,
 - 2. InterLATA intrastate, and
 - 3. InterLATA interstate
- (b) Volume of intrastate, interMTA minutes terminated by you on behalf of wireless carriers, and dollars billed for such intrastate, interMTA minutes;
- (c) Volume of local minutes terminated by you and dollars billed for wireless traffic as reciprocal compensation for such traffic;
- (d) Volume of local minutes terminated by you and dollars billed for non-wireless traffic as reciprocal compensation for such traffic.

Response:

FPB's switch is not a wireless or tandem switch and cannot identify wireless calls. Accordingly, FPB does not bill or charge for the items described in this request.

ITEM 7:

What rate(s) do you charge for termination of intraMTA wireless calls? Provide the source showing the basis for each such rate(s).

Response:

FPB's switch is not a wireless or tandem switch and cannot identify wireless calls. Accordingly, FPB does not bill or charge for intraMTA wireless calls. However, FPB would charge the tariffed switched access rates.

ITEM 8:

What rate(s) do you charge for termination of VoIP calls originated by VoIP providers?

Response:

FPB cannot identify VoIP traffic. However, FPB would charge the tariffed switched access rates.

ITEM 9:

For each year from 2001 through 2010, and for 2011 most recent data available, provide, and in (a) through (d) specifically identify and group the revenues in a matrix by (1) type of provider (CLEC/ILEC, mobile wireless services provider, cable VoIP services provider, and non-cable VoIP services provider), and by (2) each rate element billed. Please identify separately (if any) revenues from your non-ILEC affiliates.

- (a) Total *intrastate, terminating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
- (b) Total *intrastate, originating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
- (c) Total *interstate, terminating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
- (d) Total *interstate, originating* switched access revenues billed (including non-traffic sensitive revenues) and MOUs;
- (e) Please provide the work papers for the rate elements, volumes, revenues and associated calculations for (a) through (d) above in electronic/Excel format. Please specify the unit of measure for each rate element (e.g., MOU, circuit/month, line, message, etc.). If the billing basis is not MOU, please provide the relevant quantities associated with each rate element.

ITEM 9: Response:

AT&T Only (Revenues; MOU)

YEAR 2006	(a) \$32,754.24; 818,856	(b) \$37,213.92; 930,348	(c) \$5,924.32; 1,443,575	(d) \$2,839.99; 512,351
2007	\$30,652.32; 1,316,247	\$25,627.75; 943,062	\$8,142.81; 2,241,978	\$4,815.07; 912,575
2008	\$26,360.61; 2,196,716	\$10,797.63; 803,322	\$9,664.19; 2,962,195	\$5,388.86; 1,148,448
2009	\$45,281.05; 3,766,953	\$5,772.91; 421,214	\$19,396.20; 5,942,897	\$6,418.98; 1,297,033
2010	\$37,332.25; 3,078,475	\$1,660.58; 122,044	\$14,285.22; 4,370,151	\$8,098.60; 1,587,010
2011	\$13,146.59; 1,075,450	\$412.66; 30,298	\$5,710.68; 1,745,139	\$3,252.11; 635,671

Other Carriers (Revenues; MOU)

YEAR 2006	(a) \$140,482.28; 7,949,222	(b) \$95,690.76; 2,392,269	(c) \$21,713.68; 5,295,286	(d) \$7,202.64; 1,357,979
2007	\$173,858.90; 7,683,605	\$82,555.70; 2,367,484	\$34,429.26; 8,561,697	\$13,433.03; 2,546,106
2008	\$181,662.87; 8,777,101	\$51,409.81; 1,820,999	\$38,864.54; 9,982,458	\$15,338.18; 2,970,462
2009	\$156,960.37; 8,900,225	\$28,802.95; 1,000,463	\$40,235.94; 10,953,123	\$16,254.27; 3,078,546
2010	\$107,809.83; 6,773,265	\$15,077.83; 460,100	\$32,894.90; 8,844,215	\$19,323.78; 3,584,430
2011	\$38,269.71; 2,544,641	\$4,993.66; 144,921	\$9,898.05; 2,751,865	\$7,921.37; 1,458,968

(e): FPB first began billing for switched access in 2006. The Excel spreadsheet shows the calculations used to reach the totals contained in (a)-(d). The rates used are 0.04 (intrastate) and 0.01258 (interstate) per minute.

ITEM 10:

For 2010, and for 2011 most recent data available, for you and your affiliates (if any), please provide the following:

- (a) Total Kentucky *intrastate* originating and terminating switched MOUs and access expenditures paid to other providers (*i.e.*, ILECs and CLECs, excluding payments to any of your affiliates). Please provide payments to each carrier and group by ILECs and CLECs separately;
- (b) Total Kentucky *interstate* originating and terminating switched MOUs and access expenditures paid to other providers (*i.e.*, ILECs, and CLECs, excluding any of your affiliates). Please provide payments to each carrier and group by ILECs and CLECs separately;
- (c) Please respond to (a) and (b) for the traffic (excluded above) between you and your Kentucky affiliates.

Response:

FPB objects to providing intrastate and interstate switched minutes of use.

First, AT&T is the only provider that switches calls for FPB. As such, AT&T has all of the information requested in Item #10 in its possession. Second, the number of minutes of use switched by AT&T on behalf of FPB will not assist in the determination of whether intrastate rates are set at unreasonable levels.

Without waiving these objections, FPB does not maintain separate accounts for amounts that it pays to AT&T for intrastate and interstate switching. Likewise, FPB does not track the minutes of use for switched calls made on its behalf.

However, in 2010, FPB paid AT&T \$94,186.32 for both intrastate and interstate switching. As of May 19, 2011, FPB paid AT&T \$29,348.20 for both intrastate and interstate switching.

ITEM 11:

Please provide separate estimates of the percentage of terminating intercarrier traffic you and your parent companies and affiliates receive both in Kentucky and nationwide that lacks sufficient call detail or signaling information to either (a) identify the carrier financially responsible for intercarrier charges or (b) apply the proper compensation regime for interstate access, intrastate access, and reciprocal compensation (such traffic is generally and collectively known as "phantom traffic".)

Response:

FPB objects that the question calls for speculation. Without waiving this objection, one half percent or less of FPB's traffic is estimated as "phantom traffic."

ITEM 12:

What is your practice for determining the intercarrier compensation applicable to traffic that lacks sufficient information to otherwise identify the traffic's proper intercarrier compensation regime? Cite all your intrastate and interstate tariffs, interconnection agreements, or other relevant sources that determine what intercarrier compensation system should apply to such traffic.

Response:

Traffic that lacks sufficient information to identify the traffic's proper intercarrier compensation regime is not billed.

ITEM 13:

Please provide your estimate of the percentage of your terminating intercarrier traffic, both for traffic sent or received by you in Kentucky, for which the compensation regime (interstate access, intrastate access, or reciprocal compensation) is mischaracterized.

Response:

FPB objects that the question calls for speculation. Without waiving this objection, FPB has received no complaints that the compensation system has been mischaracterized. FPB would estimate that one half percent or less of the terminating intercarrier traffic is mischaracterized.

ITEM 14:

Have you, your parent companies and/or affiliates filed any appeals of FCC Orders that established your interstate switched access rates?

Response:

ITEM 15:

Have you ever made a claim or appeal in any forum that your existing interstate switched access rates are not compensatory or are confiscatory? Please list every instance where such claim or appeal was made, provide all evidence supporting such claim, and indicate the result of the related challenge or appeal (if any)?

Response:

ITEM 16:

Regarding the origination and termination of landline toll traffic in Kentucky:

- (a) Does the function provided by you for interstate originating and terminating switched access service materially differ from the functionality provided for your intrastate originating and terminating switched access service? If so, identify and describe each material difference in detail, and quantify the cost difference caused by each purported material difference.
- (b) Does the functionality you use to provide terminating switched access services, either for interstate or intrastate toll calls, materially differ from the functionality you use to provide local call termination for which either the FCC adopted reciprocal compensation charge or local interconnection charge applies? If so, identify and describe each material difference in detail, and quantify the cost difference caused by each purported material difference.
- (c) Does the function you perform to provide terminating switched access services, either for interstate or intrastate calls, materially differ from the function you use to terminate VoIP originated calls? If so, identify and describe each material difference, and quantify the cost difference caused by each purported material difference.
- (d) Does the function you perform to provide terminating switched access services, either for interstate or intrastate calls, materially differ from the function you use to terminate intraMTA wireless calls, either interstate or intrastate? If so, identify and describe each material difference, and quantify the cost difference caused by each purported material difference.

Response:

16(a)-(d): FPB objects to this request on the basis that the terms "function" and "functionality" are vague and imprecise.

Without waiving this objection, FPB notes that there are several factors that could lead to cost differences in switching costs between CLECs and ILECs. For example, CLECs do not have the same economies of scale as large ILECs. Likewise, CLECs may have lower facility utilization than large ILECs. Finally, CLECs have a sparser customer base than large ILECs.

ITEM 17:

In accordance with the FCC's April 26, 2001 Seventh Report and Order in CC Docket 96-262, have you capped your interstate switched access rates to the level of the interstate switched access rates of the incumbent local exchange carrier with which you compete?

Response:

Yes.

ITEM 18:

Do you or any of your parent companies or affiliates in any other state mirror your interstate and intrastate access rates or any individual rate elements? Also, are you subject to any future mirroring (e.g., by an order that requires phased-in mirroring)?

- (a) Please list all states where you or an affiliate company mirror these rates or rate elements;
- (b) Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you or an affiliate entity to mirror these rates;
- (c) Please state whether you or your affected affiliate entity appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge.
- (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?

Response:

FPB mirrors the interstate switched access rates of the ILEC with which it competes. FPB is not subject to any future mirroring and operates only in Kentucky.

ITEM 19:

Do you or any of your parent companies or affiliates in any other state mirror the intrastate access rates or any individual rate elements of the competing ILEC, or have you or any of your parent companies or affiliates been ordered to do so in the future?

- (a) Please list all states where you mirror these rates or rate elements;
- (b) Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you to mirror these rates;
- (c) Please state whether you appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge.
- (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?

Response:

ITEM 20:

If not otherwise identified in Data Requests 18 and 19, have you or any of your parent companies or affiliates in any other state been ordered to restrict its access rates in any way?

- (a) Please list all states where your access rates are restricted and describe the restriction;
- (b) Please describe and identify (by docket number, relevant statute section, or other similar type of identifier) the proceedings or legislation that led you to restrict your access rates;
- (c) Please state whether you appealed any order of any state commission or challenged any statute involved in (a) or (b) above. If yes, identify each appeal or challenge.
- (d) If the answer to (c) indicates "Yes," what was the result of the related appeal or challenge?

Response:

ITEM 21:

Have you ever filed a pleading with the FCC indicating your support for a unified interstate and intrastate rate? If yes, provide such filing or a cite to obtain the document if publicly available.

Response:

ITEM 22:

Do you provide intrastate toll and interstate toll services in Kentucky? If not, do you have an affiliate that provides those services? If so, provide the names of the affiliates and the type of service they provide.

Response:

No. FPB does not have an affiliate providing toll services.

ITEM 23:

For each year from 2001 through 2010, and for 2011 most recent data available, for you and your affiliates (if any), please provide the following:

- (a) Total Kentucky intrastate toll MOUs and revenues;
- (b) Total Kentucky interstate toll MOUs and revenues

Response:

FPB does not provide intrastate or interstate toll services.

ITEM 24:

Do you have any elasticity studies for local or toll services? If so, please produce copies of them.

Response:

ITEM 25:

Provide the total amount of revenues and volumes for retail vertical services for each year from 2001 through 2010, and for 2011 most recent data available.

Response:

FPB does not maintain revenue and volume data prior to 2007. The following spreadsheet reflects revenues and volumes for vertical services since that time. The volume numbers in the spreadsheet reflect the number of times a particular service was billed in that year. For example, if 2,000 lines had call waiting as a feature, the call waiting service would be billed 24,000 times during that year at the applicable rate.

	PERIOD	2007 (F	2007 (From April)	72	2008	2(2009	2	2010	2011 (T	2011 (Thru April)
SERVICE	Description	VOLUME	VOLUME REVENUE	VOLUME REVENUE		VOLUME REVENUE		VOLUME REVENUE		VOLUME REVENUE	REVENUE
	The state of the s										
3WAYR	Three Way Calling Residential	484	\$1,270.55	281	\$1,482.14	497	\$1,314.75	444	\$1,164.49	122	\$302.65
CALLACCEPTR	Selective Call Acceptance Residential	17	\$35.73	51	\$92.76	48	\$84.64	27	\$49.71	8	\$16.00
CALLFWDDR	Call Forwarding Deluxe Residential	325	\$1,269.45	438	\$1,727.80	466	\$1,789.74	412	\$1,628.45	141	\$553.72
CALLFWDR	Call Forwarding Universal Residential	518	\$1,502.50	794	\$2,303.82	725	\$2,085.65	678	\$2,001.30	227	\$668.87
CALLIDDR	Caller ID Deluxe Residential	4111	\$20,145.51	5419	\$26,414,70	4861	\$23,630.90	4333	\$21,225.60	1352	\$6,585.85
CTR	Selective Call Rejection Residential	1239	\$2,363.18	1906	\$3,638.80	1969	\$3,783.26	2021	\$3,929.93	650	\$1,252.94
1	Call Return Residential	904	\$3,063.56	1198	\$4,084.70	1086	\$3,670.91	086	\$3,334.66	308	\$1,067.42
CALLTRACER	Call Tracing Residential	88	<u> </u>	147	\$453.14	107	\$337.90	121	\$382.15	43	\$127.44
CALLWAITDR	Call Waiting Deluxe Residential	25216	\$122,761.93	35187	\$171,149.87	23967	\$164,270.28	31287	\$151,543.81	9704	\$47,337.03
CALLWAITR	Call Waiting Residential	3817	\$10,903.30	4617	\$13,191.30	3994	\$11,584.29	3618	\$10,470.77	1096	\$3,184.27
TENLINE1R	Teen Ring	686	\$2,918.00	1338	\$3,844.24	1250	\$3,629,66	1131	\$3,282.44	84	\$1,000.66
TEENLINEZR	Second Teen Ring	38	<u> </u>	9/	\$126.10	ස	\$106.22	48	\$83.38	13	\$19.81
VALU4PACKR	Four Pack Plan Pesidential	3706	\$38	4782	\$46,261.00	4339	\$41,865.30	3853	\$37,550.60	1159	\$11,218.25
VALUPACKR	Value Pack Plan Residential	228	\$3,924.32	322	\$5,651.05	300	\$5,200.44	270	\$4,633.84	81	\$1,414.22
3WAYSB	Three Way Calling Small Business	40	\$195.26	28	\$259.88	42	\$192.26	45	\$207.93	19	\$83.49
CALLFWDDSB	Call Forwarding Deluxe Small Business	141	\$934.34	222	\$1,508.54	293	\$1,988.03	272	\$1,780.21	66	\$708.30
CALLFWDSB	Call Forwarding Universal Small Business	131	\$394.70	173	\$458,19	124	\$374.70	131	\$381.49	50	\$136.22
CALLIDDSB	Caller ID Defuxe Small Business	162	\$1,444.23	234	\$2,001.95	211	\$1,827.90	202	\$1,780.05	92	\$558.31
CALLIDSB	Caller ID with # Delivery Small Business	59	\$376.66	0./	\$458.18	52	\$347.97	20	\$327.13	12	\$84.00
CALLREJECTSB	CALLREJECTSB Selective Call Rejection Small Business	73	\$236.80	160	\$452.90	120	\$360.00	120	\$360.00		\$120.00
CALLRETSB	Call Return Small Business	77	\$267.94	104	\$357.00	85	\$291.29	75	\$257.87	26	\$85.00
CALLTRACESB	CALL TRACESB Call Tracing Small Business	18	\$94.50	13	\$59.25	12	\$63.00	12	\$63.00	4	\$21.00
CALLWAITSB	Call Waiting Small Business	258	\$1,842.00	751	\$2,524.00	999	\$2,266.94	661	\$2,236.69	210	\$730.08
VALUAPACKSB	Four Pack Plan Small Business	1546	\$15,444.09	2515	\$24,919.50	2886	\$28,478.63	3162	\$31,300.34		1063 \$10,568.07
VALUPACKR	Value Pack Plan Small Business	123	\$2,231.72	154	\$2,612.57	133	\$2,400.39	153	\$2,699.23	46	\$796.50

CALLFWDLB	Call Forwarding Universal Large Business	6	27	12	\$36.00	12	\$36.00	12	\$36.00	4	\$12.00
CALLIDDILB	Caller ID Deluxe Large Business	0	\$0.00	5	\$63.58	12	\$108.00	12	\$108.00	4	\$36.00
CALLWAITLB	Call Waiting Large Business	2	10.36	17	\$66.73	24	\$84.00	24	\$84.00	8	\$28.00

ITEM 26:

Provide a schedule reflecting your local rates for residential

and business customers by rate group for the last 10 years.

Response:

FPB objects to this request on the ground that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, please see FPB's current rate card.

Respectfully submitted,

Hance Price

Staff Attorney

Frankfort Plant Board 317 W. 2nd Street

Frankfort, KY 40601

(502) 352-4381

hprice@fewpb.com

This the 10^{12} day of June, 2011.

CERTIFICATE OF SERVICE

I hereby certify that the electronic version of this filing made with the Commission on June 10, 2011 is a true and accurate copy of the document filed herewith in paper medium; that the electronic version of the filing has been transmitted to the Commission; that an original and one copy of the filing will be delivered to the Commission on June 10, 2011; and that, on June 10, 2011 electronic notification of the electronic filing was provided to the Commission and the parties of record for whom an e-mail addresses is provided in the on-line service list for this proceeding.

Hance Price

FRANKFORT PLANT BOARD'S RESPONSE TO AT&T'S FIRST DATA REQUESTS DATED MAY 2, 2011

ITEM 26

EX. 1

CABLE/TELCOM/SECURITY RATES

<u>Limited Basic</u> \$19.00 Channels 2-27 (excluding channel 4) QAM Tuner or \$1.00 DTA required for service Classic Cable \$39.00 Channels 2-75 (excluding channel 4) QAM Tuner or \$1.00 DTA required for service Premium Multiplex Packages Are Available choose HBO, Cinemax, Showtime/TMC or Star/Encore.

...add HBO - \$13.50 ...add Cinemax or Showtime/TMC or Starz/Encore: \$11.50 ...Discounts: Any 2: \$3.00 Off Any 3: \$6.00 Off All Premium Channels: \$13.00 Off

Premium channels require a Digital converter (DCT) per television. Each converter is \$4 per month and includes a remote, access to pay-per-view (channels 400-407 & ESPN Sports PPV channels 451-457) and TV Guide interactive.

Sign up for a Premium Channel to get multiple versions of that channel at no additional charge. See the Channel Line-up in booklet for a list of all HBO, Cinemax, Showtime/TMC and Starz/Encore channels.

Preferred Cable \$10

Classic Cable and Set-top Convertor required. Each Set-top includes a remote, access to pay-per-view, channels 100 -176, 200 -237, and TV Guide Interactive. Each Digital Set-Top Convertor is \$4.00, HD Set-Top Convertor \$5.00, HD/DVR Set-Top Convertor is \$8.00 or TIVO Convertor is \$20.00 per month.

Digital Cable Card

One-time \$110 fee, Cable Card is not capable of delivering the digital interactive guide, pay-per-view or DVR. Classic Cable is required.

HDTV Plus \$10 Channels (770-776) Classic Cable & Preferred Cable are required. Charge applies once per account.

Local Telephone Monthly Main Residential Line \$13.25

FCC Network Access Charge per line \$6

Each Additional Line \$13.25 Optional Calling Packages

Four Pack: \$10.00 per line, call Waiting Deluxe, caller ID Deluxe, call Forwarding (Universal), three Way calling.

Value Pack: \$18.00 per line, call return, three Way calling, repeat Dialing, call Waiting (w/ *70 deactivation feature), caller ID Deluxe, call Forward Deluxe, call tracing, selective call rejection, selective call Acceptance, speed call 30 numbers.

Telephone features (a la carte per line): extended 502 calling Area (\$12.00); call return *69 (\$3.50); three Way calling (\$2.75); repeat Dialing (\$3.25); call Waiting (\$3.00); call Waiting Deluxe with caller ID (\$5.00); caller ID (\$4.00); caller ID Deluxe (\$5.00); caller ID Blocking (\$0); Voice Mail (\$3.50); Voice Mail w/ sub mailboxes (\$5.00); call Forwarding Deluxe (\$4.00); call Forwarding Universal (\$3.00); teen ring (\$3.00); 2nd teen ring (\$1.75); call tracing *57 (\$3.25); selective call Acceptance (\$2.00); Anonymous call rejection (\$2.50); speed call 8 numbers (\$2.75); speed call 30 numbers (\$3.25); speed call 50 numbers (\$3.75); selective call rejection (\$2.00); Unlisted number -not in directory, optional (\$3.50); Unpublished number (\$5.50); Additional listing (\$1.50 each); number Portability charge (optional, one-time charge): \$15.

Simple 6¢ Long Distance (Continental US, Hawaii, Canada, Mexico, & Puerto Rico)

FPB Broadband Monthly Prices (residential) All speads include between 5-8 e-mail accounts
w/ Expanded Basic Cable & Local Telephone on 1 bill w/ Expanded Basic Cable OR Local Telephone on 1 bill

...by itself (a la carte)

1.0 MB \$26 4.0 MB \$39 2.0 MB \$34 8.0 MB \$48 1.0 MB \$29 4.0 MB \$42 2.0 MB \$37 8.0 MB \$51 1.0 MB \$32 4.0 MB \$45 2.0 MB \$40 8.0 MB \$54

Security Services Monthly Prices

Basic Residential Service ...w/ one-time installation fee \$18.95

New installation fee (one-time fee): \$350 ... W/ no installation fee \$28.95

Conversion installation fee (one-time fee): \$100 ... W/conversion & no installation fee \$23.95

Additional Security Services options -wired system, one time fees: Glass Break (\$60); contact (\$50); indoor sirens (\$25); Motion (\$35); Water (\$60); temperature Fluctuation (\$75); outdoor sirens (\$50); Key Pad (led) (\$50); Key Pad (LCD) (\$120); remote Medical Alert (\$150); cellular Alarm radio (Alarm net)1 (\$300); Cellular Phone Back-up 1 (\$1000); FPB Dedicated Security Phone line 1 (when available) (\$500); Smoke Detection (\$80); Heat Detector (\$45); One-2-One (two Way Voice) (\$500).

Additional Security Services options -wireless system: Glass Break (\$100); Contact (\$50); Indoor Sirens (\$50); Motion (\$100); Water (\$110); Temperature Fluctuation (\$125); Outdoor Sirens (\$50); Key Pad (led) (\$50); Key Pad (LCD) (\$110); Remote Medical Alert (\$100); Cellular Alarm Radio 1 (Alarm net) (\$300); Cellular Phone Back-up 1 (\$1000); FPB Dedicated Security Phone line 1 (when available) (\$500); Smoke Detection (\$80); Heat Detector (\$45); One-2-One (Two Way Voice) (\$500).

Monthly Security Services options charges: Water Package (\$1); Carbon Monoxide (\$1); Remote Medical Alert (\$1); First three options (\$2); Cellular Phone Back-up 2 (\$10); Cellular Radio Back-up 2 (\$10); FPB Dedicated Security Phone line 2 (when available) (\$10); One-2-One (Two Way Voice) (\$5) Repair or Maintenance: \$38.